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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

NIKE, INC., an Oregon corporation,

Plaintiff,

v.

**TUNG WING HO, KYLE KEOKI
YAMAGUCHI, DENISE WEI-CHING
YEE, SHU-CHU YAMAGUCHI, and
JASON M. KEATING,**

Defendants.

Case No. 3:14-cv-00696-MO

JOINT PROPOSED CASE SCHEDULE

Pursuant to the Court's April 24, 2015, Order, Plaintiff Nike, Inc. and Defendant Jason M. Keating respectfully submit the following joint proposed case schedule.

1. In a parallel criminal proceeding, Mr. Keating will be sentenced in *USA v. Jason Michael Keating*, United States District Court for the District of Oregon Case No. 3:14-cr-00282-KI-3, on September 2, 2015.

JOINT PROPOSED CASE SCHEDULE

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2. The parties continue to actively engage in settlement negotiations.
3. The filing of a Fed. R. Civ. P. 16 pre-trial order and Fed. R. Civ. P. 26(a)(1) initial disclosures are waived. Fed. R. Civ. P. 26(f) conferences are also waived.
4. In light of the above, the following case schedule is proposed by the parties:

Date	Event
8/3/2015	Parties may serve discovery requests
9/18/2015	Deadline for filing of Amended Answer, if any
9/18/2015	In light of his 9/2/15 sentencing, Keating may wait until this date to serve responses and objections to Nike's discovery requests served on or before 8/14/15, and produce responsive documents thereto
11/13/2015	Close of discovery
12/4/2015	Dispositive motion deadline
3/1/2015	Trial

5. All other deadlines shall be as provided in the Federal Rules of Civil Procedure and the Local Rules for the District of Oregon.

DATED this 8th day of June, 2015.

KEVIN SALI LLC

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